IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GARY RAY COLLINS, SR.)
Plaintiff,) Civil Action No. 14-7191)
v.)
TRANS UNION, LLC, ET AL.)
Defendants.)))

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT CREDIT PLUS, INC.'S MOTION TO DISMISS

Plaintiff Gary Ray Collins, Sr., hereby moves this Court for an order extending the deadline for Plaintiff to respond to Defendant Credit Plus, Inc.'s Motion to Dismiss (Dk. No. 14) ("Motion") up to and including February 13, 2015. Plaintiff's motion is supported by the following:

- 1. On January 20, 2015, Defendant filed the Motion.
- 2. Plaintiff's response to the Motion is currently due on or before February 6, 2015.
- 3. Counsel for Plaintiff requests a one-week extension of time to respond to the Motion, up to and including February 13, 2015, due to fulfilling obligations in other previously scheduled matters that are currently pending at the same time.
- 4. This is Plaintiff's first request for an extension of the response deadline for the Motion.
- 5. Counsel for Plaintiff conferred with counsel for Defendant Credit Plus, Inc. and Defendant's counsel advised that Defendant does not anticipate submitting an opposition to the instant request for an extension of time.
 - 6. A proposed order granting this Motion is filed herewith.

WHEREFORE, Plaintiff respectfully requests an extension of time up to and including February 13, 2015, to respond to Defendant's Motion.

Respectfully submitted, this 5th day of February, 2015.

FRANCIS & MAILMAN, P.C.

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